

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
700 SOUTH SEVENTH STREET, LAS VEGAS, NEVADA 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com

CAMPBELL & WILLIAMS
DONALD J. CAMPBELL, ESQ. (1216)
djc@campbellandwilliams.com
J. COLBY WILLIAMS, ESQ. (5549)
jcw@campbellandwilliams.com
700 South Seventh Street
Las Vegas, Nevada 89101
Telephone: (702) 382-5222
Facsimile: (702) 382-0540

*Attorneys for Defendants
Zuffa, LLC and Dana White*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARK HUNT, an individual,)	Case No. 2:17-cv-00085-JAD-CWH
)	
)	
Plaintiffs,)	DECLARATION OF J. COLBY
)	WILLIAMS IN SUPPORT OF
vs.)	DEFENDANTS ZUFFA, LLC'S AND
)	DANA WHITE'S MOTION TO
ZUFFA, LLC d/b/a ULTIMATE FIGHTING)	DISMISS PLAINTIFF MARK
CHAMPIONSHIP, a Nevada limited liability)	HUNT'S SUPPLEMENTAL
Company; BROCK LESNAR, an individual;)	COMPLAINT PURSUANT TO
and DANA WHITE, an individual; and DOES)	FED. R. CIV. P. 12(B)(6)
1-50, inclusive,)	
)	[Filed Under Seal - Exhibits 1-8; 10-11;
Defendants.)	and 16]

I, J. COLBY WILLIAMS, declare as follows:

1. I am an attorney admitted to practice before the courts of the state of Nevada, Bar No. 5549. I am a partner in the law firm Campbell & Williams and represent Defendants Zuffa, LLC ("Zuffa") and Dana White ("White") in the above-captioned matter.

2. I make this declaration in support of Defendants Zuffa, LLC's and Dana White's Motion to Dismiss Plaintiff Mark Hunt's Supplemental Complaint Pursuant to Fed. R. Civ. P. 12(b)(6). Based on my review of the files and records in this case, I have personal knowledge of the contents of this declaration and could testify thereto.

3. Attached Exhibit 1 is a true and correct copy of the Bout Agreement for UFC 200, which was executed by Zuffa and Plaintiff Mark Hunt (“Hunt”) on June 6, 2016. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in Hunt’s Supplemental Complaint (“Supp. Comp.”) and has been expressly incorporated therein. *See* Supp. Comp. ¶ 179.

4. Attached Exhibit 2 is a true and correct copy of the Promotional and Ancillary Rights Agreement executed by Zuffa and Hunt on August 8, 2014 (the “2014 Promotional Agreement”). As set forth in more detail in the accompanying Request for Judicial Notice, the 2014 Promotional Agreement is integral to the allegations and claims contained in the Supplemental Complaint.

5. Attached Exhibit 3 is a true and correct copy of the Letter of Agreement executed by Zuffa and Hunt on August 8, 2014 (the “2014 LOA”). As set forth in more detail in the accompanying Request for Judicial Notice, the 2014 LOA is integral to the allegations and claims contained in the Supplemental Complaint.

6. Attached Exhibit 4 is a true and correct copy of the Bout Agreement for UFC Asia Fight Series (Hunt-Roy Nelson), which was executed by Zuffa and Hunt on August 11, 2014. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental Complaint.

7. Attached Exhibit 5 is a true and correct copy of the Bout Agreement for UFC 180 (Hunt-Fabricio Werdum), which was executed by Zuffa and Hunt respectively on October 30, 2014 and October 23, 2014. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental Complaint.

8. Attached Exhibit 6 is a true and correct copy of the Bout Agreement for UFC Ultimate Fight Night (Hunt-Stipe Miocic), which was executed by Zuffa and Hunt respectively on

February 17, 2015 and February 16, 2015. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental Complaint.

9. Attached Exhibit 7 is a true and correct copy of the Bout Agreement for UFC 193 (Hunt-Antonio Silva), which was executed by Zuffa and Hunt on or about October 5, 2015. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental Complaint including, in part, because this bout was a rematch of the Hunt-Silva fight that ended in a majority draw in Hunt's favor on December 7, 2013. *See* Supp. Comp. ¶ 102.

10. Attached Exhibit 8 is a true and correct copy of the Bout Agreement for UFC on Fox Sports 1 (Hunt-Frank Mir), which was executed by Zuffa and Hunt on January 1, 2016. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental Complaint. *See* Supp. Comp. ¶ 101.

11. Attached Exhibit 9 is a true and correct copy of the National Library of New Zealand Catalogue for *Born to Fight*, a book authored by Mark Hunt, reflecting that it was published in 2015. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental Complaint. *See* Supp. Comp. ¶ 116.

12. Attached Exhibit 10 is a true and correct copy of the Bout Agreement for UFC 209 (Hunt-Alistair Overeem), which was executed by Zuffa and Hunt respectively on January 3, 2017 and January 1, 2017. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental Complaint.

13. Attached Exhibit 11 is a true and correct copy of the Bout Agreement for UFC on Fox Sports 1 (Hunt-Derrick Lewis), which was executed by Zuffa and Hunt respectively on March 18, 2017 and March 11, 2017. As set forth in more detail in the accompanying Request for Judicial Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental Complaint.

14. Attached as Exhibit 12 is a true and correct copy of a column authored by Plaintiff Mark Hunt titled “*If I die fighting, that’s fine.*” The column was published on or about July 4, 2017 on the website www.playersvoice.com. The column is publicly available at <https://www.playersvoice.com.au/mark-hunt-if-i-die-fighting-thats-fine/#QisVzfas1UGZ7GpR.97> (last visited March 19, 2018). This column was expressly incorporated into the Supplemental Complaint in Paragraphs 125(d)-(e).

15. Attached as Exhibit 13 is a true and correct copy of an open letter authored by Zuffa’s President, Dana White, that was published in The Daily Telegraph dated on or about October 28, 2017. The open letter is publicly available at <https://www.dailytelegraph.com.au/sport/ufc-boss-dana-whites-full-letter-on-mark-hunt-suspension-feud/news-story/bb9198661b5f28d28966550c1deb771e> (last visited March 19, 2018). The open letter explains the reasons for Zuffa’s decision to remove Hunt from UFC Fight Night 121 in the wake of his aforementioned column. Zuffa’s response to Hunt on this subject is specifically referenced in the Supplemental Complaint at Paragraphs 125(e), 125(i), and 125(j).

16. Attached as Exhibit 14 is a true and correct copy of a column authored by Kevin Iole of Yahoo! Sports titled “*Mark Hunt shouldn’t be mad at Dana White or UFC.*” The column was published on the website sports.yahoo.com on or about October 11, 2017 and explains the public’s favorable reaction to Zuffa’s decision to remove Hunt from the aforementioned fight card due to

1 safety concerns. The column is publicly available at [https://sports.yahoo.com/mark-hunt-](https://sports.yahoo.com/mark-hunt-shouldnt-mad-dana-white-ufc-192433186.html)
 2 [shouldnt-mad-dana-white-ufc-192433186.html](https://sports.yahoo.com/mark-hunt-shouldnt-mad-dana-white-ufc-192433186.html) (last visited March 19, 2018).

3 17. Attached as Exhibit 15 is a true and correct copy of an article titled “*Manager: Mark*
 4 *Hunt Cleared to Fight, eyes Fabricio Werdum Rematch at UFC 221*” published on or about
 5 December 5, 2017. The article is publicly available at
 6 [https://www.forbes.com/sites/trentreinsmith/2017/12/05/manager-mark-hunt-cleared-to-fight-](https://www.forbes.com/sites/trentreinsmith/2017/12/05/manager-mark-hunt-cleared-to-fight-eyes-fabricio-werdum-rematch-at-ufc-221/#30fc97d23dba)
 7 [eyes-fabricio-werdum-rematch-at-ufc-221/#30fc97d23dba](https://www.forbes.com/sites/trentreinsmith/2017/12/05/manager-mark-hunt-cleared-to-fight-eyes-fabricio-werdum-rematch-at-ufc-221/#30fc97d23dba) (last visited March 19, 2018). In the
 8 article, Mr. Hunt’s manager explains that Hunt underwent additional medical testing at the Lou
 9 Ruvo Center for Brain Health, had been medically cleared, and was looking to be placed on the
 10 event card for UFC 221.

11 18. Attached as Exhibit 16 is a true and correct copy of the Bout Agreement for UFC
 12 221 (Hunt-Curtis Blaydes), which was executed by Zuffa and Hunt respectively on January 17,
 13 2018 and December 13, 2017. As set forth in more detail in the accompanying Request for Judicial
 14 Notice, this Bout Agreement is integral to the allegations and claims contained in the Supplemental
 15 Complaint.
 16

17 19. Attached as Exhibit 17 is a true and correct copy of a public record from the
 18 Government of Western Australia’s Combat Sports Commission reflecting Hunt’s participation in
 19 UFC 221 in Perth, Western Australia.
 20

21 20. I declare under penalty of perjury under the laws of the United States of America
 22 that the foregoing is true and correct.
 23

24 21. Executed this 23rd day of March 2018, in Las Vegas, Nevada.

25 /s/ J. Colby Williams
 26 J. COLBY WILLIAMS
 27
 28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **Declaration of J. Colby Williams in Support of Defendants Zuffa, LLC's and Dana White's Motion to Dismiss Plaintiff Mark Hunt's Supplemental Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) (Filed Under Seal - Exhibits 1-8, 10-11, and 16)** was served on the 23rd day of March, 2018 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

An unredacted copy of the foregoing Declaration and all exhibits thereto was served on the 23rd day of March, 2018 via e-mail to the following:

Christina Denning, Esq.
denningc@higgslaw.com

Scott J. Ingold, Esq.
ingolds@higgslaw.com

*Attorneys for Plaintiff
Mark Hunt*

Howard Jacobs, Esq.
howard.jacobs@athleteslawyer.com

Peter S. Christiansen, Esq.
pete@christiansenlaw.com
Kendelea Works, Esq.
kworks@christiansenlaw.com

*Attorneys for Defendant
Brock Lesnar*

/s/ J. Colby Williams
An employee of Campbell & Williams

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
700 SOUTH SEVENTH STREET, LAS VEGAS, NEVADA 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com